

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Plaintiff	Case Number
Root Four Imagination Inc., Maurice Tuff, and Gregory Browne vs.	1:16-cv-03149
LexisNexis Risk Solutions Inc.	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Plaintiff	Case Number
Root Four Imagination Inc., vs.	1:15-cv-03223-PAE
LexisNexis Risk Solutions Inc.	
Defendant	

Status of Earlier Filed Case:☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint was filed on 4/23/2016 and the case is currently in fact discovery, with a pretrial order deadline of 9/14/2016. Some of the claims being asserted in this complaint were subject of a motion to amend the first case, which the Court denied without prejudice to plaintiff's right to file a separate action.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Several of the causes of action asserted in the newly filed case are based on the same written contracts and course of dealing between plaintiff Root Four Imagination and defendant LexisNexis Risk Solutions that are at issue in the earlier filed case. The newly filed case concerns, in part, additional breaches of the contracts by defendant that plaintiff learned of during discovery in the earlier filed case, in which plaintiff is pursuing claims of breach of the same contracts. The newly filed case also concerns, in part, ownership and inventorship of patents purportedly owned by defendant. The contracts between the parties, which are at issue in the earlier filed case, contain provisions concerning ownership of intellectual property rights that form one basis for plaintiff's right to defendant's patents. Plaintiff sought to add these new claims in the earlier filed case and the Court denied plaintiff's motion to amend without prejudice to plaintiff's right to file a separate action.

Signature: /s/ Christopher R. KinkadeDate: 4/27/2016Firm: Fox Rothschild LLP